UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

APPLICATION FOR ADMISSION PRO HAC VICE

Comes now, Peter G. Neiman (hereafter, the "Applicant"), and, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, as incorporated by Rule 1001-l(b) of the Local Bankruptcy Rules as well as this Court's *Tenth Amended Case Management Procedures* (Dkt. No. 8027) (the "CMP Order"), hereby requests to be permitted to appear and participate in this particular case, in association with the law firm of McConnell Valdés, LLC, and the undersigned members of the bar of this Court, in representation of parties in interest and defendants in Adversary Proceeding No. 19-422 Citigroup Global Markets Inc.; Goldman Sachs & Co. LLC; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Inc.; Morgan Stanley & Co. LLC; RBC Capital

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Markets, LLC; Santander Securities LLC; UBS Financial Services Inc.; and UBS Securities LLC.

Applicant herein and respectfully states:

1. Applicant is an attorney and a member of the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, with offices at:

7 World Trade Center 250 Greenwich Street New York, New York 10007

E-mail:

Peter.Neiman@wilmerhale.com

Phone:

(212) 230-8800

- 2. Applicant will sign all pleadings with the name **Peter G. Neiman**.
- 3. Applicant has been retained as a member of the above-named firm by Citigroup Global Markets Inc.; Goldman Sachs & Co. LLC; J.P. Morgan Securities LLC; Merrill Lynch, Pierce, Fenner & Smith Inc.; Morgan Stanley & Co. LLC; RBC Capital Markets, LLC; Santander Securities LLC; UBS Financial Services Inc.; and UBS Securities LLC, to appear on their behalf in Adversary Proceeding No. 19-422, in the above captioned cases now pending before the United States District Court for the District of Puerto Rico, and without waiving any of their affirmative defenses, including insufficient process, insufficient service of process, or lack of jurisdiction.
- 4. Since October 26, 1992, applicant has been and presently is a member in good standing of the bar of the State of New York, where applicant regularly practices law. Applicant's bar license number is 2505634.

5. Applicant has been admitted to practice before the following courts:

Court:	Admission Date
United States District Court for the Southern District of New York	December 7, 1993
United States Court of Appeals for the Second Circuit	August 12, 1997
United States Court of Appeals for the Ninth Circuit	July 13, 2010
United States Court of Appeals for the Fifth Circuit	May 14, 2015

- 6. Applicant is a member in good standing of the bars of the courts listed in paragraph 5 of this Application.
- 7. Applicant is not currently suspended from the practice of law before any court or jurisdiction.
- 8. Applicant is not currently the subject of any complaint for unethical conduct, disciplinary proceeding, or criminal charges before any court or jurisdiction.
- 9. During the past three (3) years, applicant has filed for *pro hac vice* admission in the U.S. District Court for the District of Puerto Rico in the matter captioned *Asociación de Empleados del Estado Libre Asociado de Puerto Rico v. UBS Financial Services Inc. et al.*, Case No. 16-cv-02237, Dkt. No. 55 (1/10/2018) (granted on 1/11/2018, Dkt. No. 56).
 - 10. Local counsel of record associated with applicant in this matter is:

Roberto C. Quiñones-Rivera, Esq.

USDC-PR No. 211512 rcq@mcvpr.com McConnell Valdés LLC 270 Muñoz Rivera Ave. San Juan, Puerto Rico 00918 Phone: (787) 250-2631

Phone: (787) 250-2631 Fax: (787) 759-9225 11. Applicant has read the Local Rules of the United States District Court for the District of Puerto Rico, which provide in part that attorneys appearing *pro hac vice* must comply with the provisions set forth therein and pay an admission fee of \$300.00 per appearance in each new case before the Court. Accordingly, payment of the *pro hac vice* admission fee is attached hereto in the form of a check or money order payable to: "Clerk, U.S. District Court".

WHEREFORE, Applicant respectfully requests to be admitted to practice in the United States District Court for the District of Puerto Rico.

Date: September 16, 2019.

Peter G. Neiman

Signature of Applicant

I HEREBY CERTIFY THAT, pursuant to L. Dist. Ct. R. 83A(f) of the Local Rules of the United States District Court for the District of Puerto Rico, that I consent to the designation of local counsel for all purposes.

Date: September 16th, 2019 San Juan, Puerto Rico Respectfully submitted,

Roberto C. Quiñones- Rivera

/s/ Roberto C. Quiñones-Rivera Signature of Local Counsel

CERTIFICATE OF SERVICE

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that on this 16th day of September, 2019, I caused a true and correct copy of this **APPLICATION FOR ADMISSION PRO HAC VICE** to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

/s/ Roberto C. Quiñones-Rivera Roberto C. Quiñones-Rivera USDC-PR No. 211512 McCONNELL VALDÉS LLC 270 Muños Rivera Avenue Hato Rey, Puerto Rico 00918 Tel.: (787) 250-2631 / 5628

Fac.: (787) 759-8282

Appellate Division of the Supreme Court of the State of New York First Judicial Department

I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

PETER NEIMAN

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on October 26, 1992, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

August 30, 2019

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Clerk of the Court